

SOUTHMAYD & MILLER

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OF COUNSEL

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AUG 11 2 17 PM '92

AL SERVICES

1233 TWENTIETH STREET, N.W.
SECOND FLOOR
WASHINGTON, D.C. 20036
TELEPHONE: (202) 331-4100
TELECOPIER: (202) 331-4123

August 10, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

AUG 10 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: The Moody Bible Institute of Chicago,
FCC Form 340 (Channel 207/Crossville,
TN)

Dear Ms. Searcy:

Transmitted herewith, on behalf of The Moody Bible Institute of Chicago, is an original, together with two copies, of FCC form 340 license application for a construction permit for a noncommercial FM station on Channel 207 at Crossville, Tennessee. There is no processing fee required in connection with this application due to the fact that Moody is recognized by the Commission as a fee-exempt entity.

Should you have any questions concerning the foregoing, please communicate with the undersigned.

Very truly yours,

The Moody Bible Institute
of Chicago

By: Jeffrey D. Southmayd/m.e.m.
Jeffrey D. Southmayd
Its Attorney

EXAMINERS

AUG 10 1992

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APPLICATION FOR CONSTRUCTION PERMIT FOR
NONCOMMERCIAL EDUCATIONAL BROADCAST STATION
(Carefully read instructions before filing form) Return only form to FCC

RECEIVED

Section 1 - GENERAL INFORMATION AUG 10 1992

For Commission Use Only

File No.

BPED-920810 MA

1. Name of Applicant The Moody Bible Institute of Chicago			FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY			Send notices and communications to the following person at the address below:		
Street Address or P.O. Box 820 N. LaSalle Drive			City Chicago			State IL		
Telephone No. (Include Area Code) (312) 329-4438			ZIP Code 60610			Name Jeffrey D. Southmayd Southmayd & Miller		
Street Address or P.O. Box 1233 20th Street, N.W. #205			City Washington			State DC		
Telephone No. (Include Area Code) (202) 331-4100			ZIP Code 20036					

2. This application is for: ☐ AM ☒ FM ☐ TV

(a) Channel No. or Frequency 207 89.3	(b) Principal Community Crossville	City Crossville	State TN
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(c) Check one of the following boxes:

☒ Application for **NEW** station

☐ **MAJOR** change in licensed facilities; call sign: _____

☐ **MINOR** change in licensed facilities; call sign: _____

☐ **MAJOR** modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ **MINOR** modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ **AMENDMENT** to pending application; application file number: _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section 1 and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No

If Yes, state:	Call letters	Community of License	
		City	State

89.3MHZ
BPED -920810MA NEW
CROSSVILLE TN
THE MOODY BIBLE INSTITUTE OF CHICAGO

Section II - LEGAL QUALIFICATIONS

Name of Applicant

The Moody Bible Institute of Chicago

1. Applicant is: *(Check one box below)*

- ☐ (a) governmental or public educational agency, board or institution
- ☒ (b) private nonprofit educational institution
- ☐ (c) Other *(specify)*

2. For applicants 1(c) only, describe in an Exhibit the nature and educational purposes of the applicant.

Exhibit No.
n/a

3. For applicants 1(c) applying for a new noncommercial educational television station only, describe in an Exhibit how the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural and civic segments of the principal community to be served.

Exhibit No.
n/a

4. Describe in an Exhibit how the proposed station will be used, in accordance with 47 C.F.R. Section 73.503 or Section 73.621, for the advancement of an educational program.

Exhibit No.
1

5. Is there any provision contained in any by-laws, articles of incorporation, partnership agreement, charter, statute or other document which would restrict the applicant in advancing an educational program or complying with any Commission rule, policy or provision of the Communications Act of 1934, as amended?

☐ Yes ☒ No

If Yes, provide particulars in an Exhibit.

Exhibit No.
n/a**CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS**

6. (a) Is the applicant in violation of the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments? (See Instruction B to Section II.)

☒ Yes ☐ No

(b) Will any funds, credits or other financial assistance for the construction, purchase or operation of the station(s) be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents?

☐ Yes ☒ No

If the answer to (b) above is Yes, attach an Exhibit giving full disclosure concerning this assistance.

Exhibit No.
n/a

7. (a) Has an adverse finding been made or an adverse final action taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law related to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☒ No

(b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in (a) above?

☐ Yes ☒ No

If the answer to (a) and/or (b) above is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), a statement of the facts upon which the proceeding is or was based or the nature of the offense alleged or committed, and a description of the current status or disposition of the matter. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c) in the case of adjudicated proceedings, the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) a description of the current status or disposition of the previously reported matter.

Exhibit No.
n/a

PARTIES TO APPLICATION

8. Complete the following Table with respect to all parties to this application:

(NOTE: If the applicant considers that to furnish complete information would pose an unreasonable burden, it may request that the Commission waive the strict terms of this requirement with appropriate justification.)

INSTRUCTIONS: If applicant is a corporation or an unincorporated association with 50 or fewer stockholders, stock subscribers, holders of membership certificates or other ownership interests, fill out all columns, giving the information requested as to all officers, directors and members of governing board. In addition, give the information as to all persons or entities who are the beneficial or record owners of or have the right to vote capital stock, membership or ownership interests or are subscribers to such interests. If the applicant has more than 50 stockholders, stock subscribers or holders of membership certificates or other ownership interests, furnish the information as to officers, directors, members of governing board, and all persons or entities who are the beneficial or record owners of or have the right to vote 1% or more of the capital stock, membership or ownership interests. If applicant is a governmental or public educational agency, board or institution, fill out columns (a), (b), and (c) as to all members of the governing board and chief executive officers.

Name and Residence Address(es) (a)	Office Held (b)	Director or Member of Governing Board		% of: Ownership (O) or Voting Stock (VS) or Membership (M) (d)
		YES	NO	
		(c)		
See Exhibit No. 2				

Section 11 - LEGAL QUALIFICATIONS (Page 3)

9. Does the applicant, or any party to the application, have a petition to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination with the AM facility proposed to be modified herein?

☐ Yes ☒ No

If Yes, provide particulars as an Exhibit.

Exhibit No.
n/a

10. Does the applicant or any party to this application have, or have they had, any interest in:

(a) a broadcast station, or pending broadcast station application before the Commission?

☒ Yes ☐ No

(b) a broadcast application which has been dismissed with prejudice by the Commission?

☒ Yes ☐ No

(c) a broadcast application which has been denied by the Commission?

☐ Yes ☒ No

(d) a broadcast station, the license of which has been revoked?

☐ Yes ☒ No

(e) a broadcast application in any pending or concluded Commission proceeding which left unresolved character issues against the applicant?

☐ Yes ☒ No

If the answer to any of the questions in (a)-(e) above is Yes, state in an Exhibit the following information:

Exhibit No.
3

- (1) Name of party having interest;
- (2) Nature of interest or connection, giving dates;
- (3) Call letters of stations or file number of application or docket; and
- (4) Location.

SECTION III - FINANCIAL QUALIFICATIONS

Note: If this application is for a change in an operating facility, DO NOT fill out this Section.

1. Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration? ☐ Yes ☒ No

2. Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision? ☐ Yes ☒ No

NOTE: If either Questions 1 or 2 is answered "Yes," your application cannot be granted until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on your part is required. If you rely on funds from a source specified in Question 2, **you must advise the F.C.C. when the funds are committed or appropriated.** This should be accomplished by letter amendment to your application, in triplicate, signed in the same manner as the original application, and clearly identifying the application to be amended.

3. The applicant certifies, except as noted above, that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without additional funds. ☒ Yes ☐ No

SECTION IV - PROGRAM SERVICE STATEMENT

Attach as an Exhibit, a brief description, in narrative form, of the planned programming service relating to the issues of public concern facing the proposed service area.

Exhibit No.
4

NOTE: No program service statement need be filed where the proposed station's programming would be **wholly** "instructional" as that type of programming is defined in the Instructions to this Section.

SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

1. Does the applicant propose to employ five or more full-time employees?

☐ Yes ☒ No

If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Program Report (FCC 396-A).

SECTION VII - CERTIFICATION

1. Has or will the applicant comply with the public notice requirements of 47 C.F.R. Section 73.3580?

☒ Yes ☐ No

2. The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. 1.2002(b).

☒ Yes ☐ No

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. *(See Section 304 of the Communications Act of 1934, as amended.)*

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant The Moody Bible Institute of Chicago	Title Vice President
Signature <i>Elizabeth A. L. Brown</i>	Date <i>August 4, 1992</i>

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of this application is in the public interest. In reaching that determination, or for law enforcement purposes, it may be necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's rules. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 78 to 302 hours 20 minutes with an average of 171 hours 36 minutes per response. These estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0034), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

EXHIBIT NO. 1

The Moody Bible Institute of Chicago is the current Commission licensee of sixteen (16) noncommercial broadcast stations. Moody will utilize the subject noncommercial FM station for the advancement of an educational program consistent with its past and present efforts on its other owned and operated stations. The station will be operated in connection with Moody's overall educational program. Moreover, the station will broadcast programming of an educational, religious, cultural and instructional nature.

Exhibit No. 2

OWNERSHIP STRUCTURE

ATTACHMENT B

Board of Trustees

<u>Name and Address</u>	<u>Office Held</u>	<u>Citizenship</u>	
Joseph M. Stowell 1371 Champion Forest Dr. Wheaton, IL 60187	President & Trustee	USA	1 vote
George Sweeting 38213 N. Bolton Pl. Antioch, IL 60002	Chancellor & Trustee	USA	1 vote
William F. Mitchell, Sr. P. O. Box 9 Boca Raton, FL 33432	Chairman, Board of Trustees	USA	1 vote
Paul H. Johnson 1400 N. Cranbrook Rd. Birmingham, MI 48009	Vice Chairman, Board of Trustees	USA	1 vote
John Elsen, M.D. 1107 Dobson Street Evanston, IL 60202-3818	Secretary, Board of Trustees	USA	1 vote
Paul W. Wills P. O. Box 374 Bath, OH 44210	Asst. Secretary and Trustee	USA	1 vote
Stuart M. Bundy, PhD San Bernardino C.C.D. 441 W. 8th Street San Bernardino, CA 92401-1007	Trustee	USA	1 vote
Robert G. Dunlop 10157 S.E. Acorn Way Tequesta, FL 33469	Trustee	USA	1 vote
Robert D. Erickson 526 N. Washington Hinsdale, IL 60521	Trustee	USA	1 vote
Thomas S. Fortson, Jr. 1535 Fieldgreen Overlook Stone Mountain, GA 30088	Trustee	USA	1 vote
Richard E. Gildner 80 Granada Drive Mason City, IA 50401	Trustee	USA	1 vote

The Moody Bible
Institute of Chicago
Attachment B - Pg. 2

Edward L. Johnson 653 Chaucer Road San Marino, CA 92208	Trustee	USA	1 vote
John MacArthur, Jr. Box 1642 Canyon Country, CA 91351	Trustee	USA	1 vote
Roy Nyholm 2407 S. Early Dawn Lane Veradale, WA 99037	Trustee	USA	1 vote
Bervin C. Peterson 4045 Evergreen Lane Northbrook, IL 60062	Trustee	USA	1 vote
E. Richard Talmadge 225 Shoreline Road LBS Barrington, IL 60010	Trustee	USA	1 vote
John Wauterlek 549 Merri Oaks Barrington, IL 60010	Trustee	USA	1 vote

OFFICERS

Joseph M. Stowell 1371 Champion Forest Dr. Wheaton, IL 60187	President & Trustee	USA
George Sweeting 38213 N. Bolton Place Antioch, IL 60002	Chancellor & Trustee	USA
Marvin E. Beckman 41445 N. Westlake Antioch, IL 60002	Sr. VP, Operations & General Counsel	USA
Dr. Howard Whaley 811 Sunset Wheaton, IL 60187	Sr. VP and Dean of Education	USA
Elizabeth A.S. Brown 1515 Davis Street Evanston, IL 60201	VP & Acting Treasurer & Asst. General Counsel	USA

The Moody Bible
Institute of Chicago
Attachment B - Pg. 3

Lloyd R. Dodson 608 Bridle Lane Wheaton, IL 60187	VP, Facilities and Support Services	USA
Brent D. Garrison 6112 Old Porter Road Portage, IN 46368	VP, External Studies	USA
B. Wayne Hopkins 988 Waverly Glen Ellyn, IL 60137	VP, Graduate School	USA
Delmar R. Mohler 319 Brookwood Terrace Roselle, IL 60672	VP, Resource Management	USA
Robert C. Neff 21375 Middleton Drive Kildeer, IL 60047	VP, Broadcasting	USA
Timothy R. Ostrander 18 Pistakee Lake Rd. N. Fox Lake, IL 60020	VP, Church Related Ministries	USA
Alan B. Terwilleger 411 Orleans Avenue Naperville, IL 60565	VP, Stewardship	USA
Gregory R. Thornton 13 Ivanhoe Lane Cary, IL 60013	VP, Moody Press	USA
Robert O. Woodburn 923 Williston Wheaton, IL 60187	VP, Undergraduate School	USA

Exhibit No. 3

The Moody Bible Institute of Chicago is the Commission licensee of the following noncommercial broadcast stations:

WMBI(AM & FM)	Chicago, Illinois
WCRF(FM)	Cleveland, Ohio
WDLM(AM & FM)	East Moline, Illinois
WMBW(FM)	Chattanooga, Tennessee
KMBI(AM & FM)	Spokane, Washington
WXYB(AM) and WKES(FM)	St. Petersburg, Florida
WRMB(FM)	Boynton Beach, Florida
WMBV(FM)	Dixon's Mills, Alabama
WAFS(AM)	Atlanta, Georgia
WGNB(FM)	Zeeland, Michigan
WGNR(FM)	Grand Rapids, Michigan
WJSO(FM)	Pikeville, Kentucky

In addition, Moody has been granted construction permits for new noncommercial FM stations at Monee, Illinois (BPED-910722MB) and Kokomo, Indiana (BPED-900809MA).

Moody is an applicant for a new noncommercial FM station at Crown Point, Indiana (BPED-900809MB) and Sandusky, Ohio (BPED-920331MB).

Moody voluntarily requested the dismissal of an application for a noncommercial FM station at Erie, Pennsylvania (FCC File BPED-8803100B). Moody filed an application on October 5, 1984 seeking permission to purchase an expired construction permit for a noncommercial FM station at Jackson, Mississippi. The Commission denied a request by the permittee, Ethnic Broadcast Foundation, to reinstate the construction permit and dismissed the assignment application. Moody voluntarily requested the dismissal of applications for noncommercial FM stations at Indianapolis, Indiana (BPED-880728MA), Brownsburg, Indiana (BPED-880725MB) and Lexington, Kentucky (BPED-880818ML) as part of universal settlements in hearing proceedings.

Moody filed an application on March 5, 1975 to modify the license for WMBI-FM, Chicago, Illinois (FCC File BPED-2001). The application was dismissed with prejudice by the Commission in 1985 (8920 GDG) pursuant to a letter denying reconsideration of an earlier dismissal on April 28, 1981.

Exhibit No. 4

PROGRAM SERVICE STATEMENT

The applicant will address the issues of public concern facing the proposed service area through the broadcast of news, public affairs programming and public service announcements.

REQUEST FOR WAIVER OF SECTION 73.1125
OF THE COMMISSION'S RULES

The Moody Bible Institute of Chicago ("Moody"), by its attorneys, hereby respectfully requests a waiver of the requirements of Section 73.1125 of the Commission's Rules¹ to allow for the operation of the above-referenced noncommercial FM station at Crossville, Tennessee as a satellite station of noncommercial station WMBW-FM, Chattanooga, Tennessee, and with its main studio located outside of the principal grade contour for the station. In support of this request the following is respectfully submitted for the consideration of the FM Branch.

Moody is the applicant for the above-referenced noncommercial FM station. The station will operate with a limited power and will serve a very limited area. However, Moody intends to address local needs through the operation of the station in spite of the limited operating power that is available for the facility.

Moody is a nonprofit, educational institution located in Chicago, Illinois, and is the Commission licensee of sixteen (16) noncommercial broadcast stations, including WMBW-FM. Moody is also the owner of the Moody Broadcasting Network, an educational programming services that provides quality programming to over 500 broadcast stations throughout the United States. Moody is

1 47 C.F.R. 1125.

committed to providing high quality educational programming on both its owned and operated stations and its network.

The proposed station will be the only noncommercial educational FM station serving the Crossville, Tennessee area. In operating it as a satellite station, Moody will faithfully ascertain the problems, needs and interests of the local community and address these through its programming. This ascertainment will be undertaken by Moody's local representative in Crossville and through periodic visits to the community by Moody's management employees. In addition, Moody will maintain a toll-free telephone number for the Crossville area and will maintain the public inspection file for the station at the local public library.

The Commission has defined a satellite station as one that operates on a normal FM channel and which meets all of the technical requirements of the Commission's rules, but one which usually originates no local programming. Rather, the satellite station traditionally rebroadcasts the programming of a parent station.² Satellite stations involve operating deviations from Commission regulations, including the main studio rule.³ However, the Commission has in the past recognized the benefits, and at times the outright necessity, of centralized operation for noncommercial educational stations, based on the limited funding available to these stations. Accordingly, it has in the past

² See, Multiple Ownership Rules, 3 RR 2d 1562 (1964).

³ 47 C.F.R. 73.1125.

granted waivers to state and regional networks, such as Moody, to operate satellite stations that do not necessarily meet the requirements of the Commission's main studio rule.

Moody requests such a waiver for the Crossville station. The station will rebroadcast the majority of the programming broadcast on noncommercial station WMBW-FM, Chattanooga, Tennessee. However, it will also ascertain and present programming to address the local problems, needs and interests of the Crossville community on the proposed station. Based on such a commitment to address local needs, the Commission has historically granted waivers of the main studio rule to allow for the satellite operation of a noncommercial FM station operated by a noncommercial network licensee. See, Memorandum Opinion And Order, in MM Docket No. 86-406, 3 FCC Rcd. 5024 (1988).

Wherefore, Moody respectfully requests a waiver of Section 73.1125 to allow for the satellite operation of the subject FM station.

ORIGINAL

ENGINEERING STATEMENT

**THE MOODY BIBLE INSTITUTE OF CHICAGO
APPLICATION FOR A NONCOMMERCIAL FM STATION
CROSSVILLE, TENNESSEE**

Channel 207C3 0.500 kW Max-DA (V) 425.2 Meters

July 28, 1992

LECHMAN & JOHNSON, INC.

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ENGINEERING STATEMENT

THE MOODY BIBLE INSTITUTE OF CHICAGO APPLICATION FOR A NONCOMMERCIAL FM STATION CROSSVILLE, TENNESSEE

Channel 207C3 0.500 kW Max-DA (V) 425.2 Meters

Engineering Statement

Table I	Separation Study
Table II	Distance to Proposed 60 dBu Coverage Contour
Table III	Allocation Study
Table IV	TV Channel 6 Interference Study
Exhibit VB-1	Sketch of Antenna
Exhibit VB-2	Interference Statement
Exhibit VB-3	Map of Site
Exhibit VB-4	Predicted 60 dBu Coverage Contour
Exhibit VB-5	Overlay of FM Allocation Study
Exhibit VB-6	Directional Antenna Information
Exhibit VB-7	Radiofrequency Radiation Study
Exhibit VB-8	Map of Predicted TV Channel 6 Area of Interference and Population Count

FCC Form 340, Sections V-B Attached

ENGINEERING STATEMENT

THE MOODY BIBLE INSTITUTE OF CHICAGO APPLICATION FOR A NONCOMMERCIAL FM STATION CROSSVILLE, TENNESSEE

Channel 207C3 0.500 kW Max-DA (V) 425.2 Meters

This engineering Statement is submitted in support of an application by The Moody Bible Institute of Chicago ("Moody"), seeking authorization to construct a new Non-Commercial FM Radio Station to serve Crossville, Tennessee. Moody proposes to use Channel 207C3 (89.3 MHz) with a maximum vertical ERP of 0.500 kw, utilizing a directional antenna system, at an antenna height above average terrain of 425.2 meters. The HAAT was determined by using the standard 8 radials and not the 24 radials used throughout this report. The proposed transmitting site is within the coverage area of Station WATE-TV Channel 6. Therefore, there is potential for interference to the service of television Station WATE-TV from the proposed Moody operation.

The applicant proposes to operate from a transmitter site located on Hinch Mountain, approximately 8 km SW of Grassy Cove, Tennessee. There is an existing 160 foot (48.8 m) tower above ground presently used by Motorola. Moody proposes to sidemount its antenna system 34 meters above ground. The geographic coordinates of the site are:

North Latitude: 35° 46' 38"
West Longitude: 84° 58' 34"

These coordinates were verified by use of a 7.5 minute topographic quadrangle map (Grassy Cove, Tennessee) of the area published by the U.S. Geological Survey. The ground elevation at the proposed site is 2940 feet (896.0 meters) above mean sea level (A.M.S.L.). The site is not located in the "Quiet Zone" of West Virginia nor is it near the Table Mountain Radio Receiving Zone in Boulder, Colorado. Accordingly, no notification is required by Section 73.1030 of the Commission's Rules and Regulations. Additionally, the proposed site will not deliver a 10 mV/m signal to any FCC monitoring station.

It is proposed to sidemount a vertically polarized FM antenna on the supporting tower with its center of radiation at the 34 meter level above ground (930 meters above mean sea level). A directional antenna system will be installed so that the maximum ERP will not exceed 0.500 kw.

LECHMAN & JOHNSON, INC.

An FCC Type Accepted Transmitter will be installed and the power adjusted to a level such that the maximum ERP will be 0.500 kW. Approximately 50 meters of 1 & 5/8 inch cablewave transmission line will be connected between the transmitter and the antenna.

Table I is a study of all co-channel and adjacent channel allocations, applications and authorized stations pertinent to operation on Channel 207C3 at the proposed site.

Table II includes the pertinent data used to predict the distances to the 60 dBu coverage contour of the proposed operation. These distances were determined by using Figure 1, F(50,50) FM propagation curves of Section 73.333 of the Commission's Rules.

Table III is an allocation study listing all pertinent stations and their appropriate contour distances.

As noted above, there is potential for interference from the proposed Moody operation to the reception of Channel 6 television Station WATE-TV at Knoxville. Table IV shows the study of predicted interference to Station WATE-TV. It is proposed to operate with vertical polarization only. The predicted area of interference lies entirely outside of communities of population of 50,000 or more. In this case, the equivalent maximum horizontally polarized power is 0.0125 kilowatts. All of the distances to the interfering contours are less than 15 km; therefore, the F(50,50) curves were used. The Commission's curves do not contain predicted field strength values for distances less than 1.5 km. For the antenna heights involved (425.2 meters average) the distance dependence of field strength agrees with that of free space propagation, that is, it is of the form $(20)\log(\text{distance})$. The field strength at 1.5 km is approximately 102.7 dBu. Thus, a constant value of 106.2 at 1.0 kilometers will produce agreement with the curves. Therefore, for distances less than 1.5 kilometer field strength, in dBu/kW is given by:

$$F = 106.2 - (20)\log(\text{Distance}).$$

Table IV shows that the population within the predicted area of interference is approximately 1588 persons based upon the latest available published census data (1980). The population count was made using census tract data. A polar planimeter was used to determine the percentage of area and hence population within each pertinent tract. Thus, the proposed operation complies with Section 73.525(e) of the Rules.

Exhibit VB-1 is a sketch of the proposed antenna and supporting structure. All pertinent heights and elevation data are included.

Exhibit VB-2 is a statement which addresses any interference potential and the applicant's acceptance of the responsibility to correct such interference.

Exhibit VB-3 is a 7.5 minute topographic quadrangle map that shows the proposed transmitter site and surrounding features. All pertinent information and markings are shown thereon to verify geographic coordinates.

Exhibit VB-4 is a 1:250,000 scale map which shows the proposed 60 dBu coverage contour, the proposed city of license and the area (2428 sq. km.) and population (52,317 persons) within the proposed 60 dBu contour. The population is based on the 1990 census using computer routines although published data is not available. The contour was drawn from the distances listed in Table II.

Exhibit VB-5 is an overlay of a map showing the allocation study using the data listed in Tables I & III of this report. As shown, operation on Channel 207C3 as proposed complies with Section 73.509 of the Rules and Regulations.

Exhibit VB-6 includes the proposed horizontal plane directional antenna patterns in relative field strength and dBk, a tabulation of the patterns and a statement concerning the antenna.

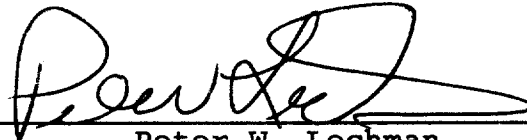
Exhibit VB-7 is a RF radiation hazard study using the formulas given in OST Bulletin No. 65. Part 73 of the FCC's Rules and Regulations was amended, effective January 1, 1986 to implement the National Environmental Policy Act of 1969 (NEPA). The rule amendment identifies human exposure to RF radiation as an issue for explicit consideration when evaluating potential environmental effects of certain facilities regulated by the FCC. The proposed facility has been evaluated based on OST Bulletin No. 65 (October 1985), "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation" and complies with these standards. Exhibit VB-7 shows the results of the calculations associated with this study and the results comply with the standards. In summary, this proposal is categorically excluded from environmental processing.

Engineering Statement
Crossville, Tennessee
Page Four

Exhibit VB-8 is a map of the predicted area of interference to the reception of Station WATE-TV from the proposed operation. Exhibit VB-8, page 2, is a tabulation of populations within the TV 6 interference area.

FCC Form 340, Section V-B, is submitted with this statement.

LECHMAN & JOHNSON, INC.

A handwritten signature in dark ink, appearing to read 'Peter W. Lechman', is written over a horizontal line.

Peter W. Lechman
Telecommunications Consultant
July 28, 1992

LECHMAN & JOHNSON, INC.

TABLE I

SEPARATION STUDY - SUMMARY SHEET

**THE MOODY BIBLE INSTITUTE OF CHICAGO
APPLICATION FOR A NONCOMMERCIAL FM STATION
CROSSVILLE, TENNESSEE**

Channel 207C3 0.500 kW Max-DA (V) 425.2 Meters

Channel 207C3 035-46-38 / 084-58-34 erp : 0.500 kw eah : 425 m

Designation =====	Channel (MHz) =====	Pertinent Allocation or Authorized Station =====	Separation Actual =====	(km) Required =====
TV	6	WATETV, KNOXVILLE, TN BLCT-2416 036- 0-13 / 083-56-35 100.00 kw / 454 m bearing from proposed = 74.56 deg	96.60	196
Co-channel	207C1 (89.3)	WLRH, Huntsville, AL BLED-1595 034-37-41 / 086-30-59 100.00 kw / 247 m bearing from proposed = 228.05 deg existing F(50,50) 60 = 67.99 km proposed F(50,10) 40 = 88.82 km existing F(50,10) 40 = 166.99 km proposed F(50,50) 60 = 31.48 km	189.55	198
2nd Adjacent	205C (88.9)	WMBW, Chattanooga, TN BLED-821020AW 034-57-43 / 085-22-40 98.00 kw / 460 m bearing from proposed = 202.00 deg existing F(50,50) 60 = 83.95 km proposed F(50,10) 80 = 9.76 km existing F(50,10) 80 = 42.88 km proposed F(50,50) 60 = 31.48 km	97.54	94

SEPARATION STUDY - SUMMARY SHEET

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APPLICATION FOR A NONCOMMERCIAL FM STATION
CROSSVILLE, TENNESSEE

Channel 207C3 0.500 kW Max-DA (V) 425.2 Meters

Channel 207C3 035-46-38 / 084-58-34 erp : 0.500 kw eah : 425 m

Designation =====	Channel (MHz) =====	Pertinent Allocation or Authorized Station =====	Separation Actual =====	(km) Required =====
2nd Adjacent	209C1 (89.7)	WDYN, Chattanooga, TN BPED-880217IA 035-10-17 / 085-18-58 100.00 kw / 250 m bearing from proposed = 204.66 deg	73.96 SHORT (78 -4.04 km)
		existing F(50,50) 60 =	68.24 km	
		proposed F(50,10) 80 =	9.76 km	
		existing F(50,10) 80 =	30.68 km	
		proposed F(50,50) 60 =	31.48 km	
2nd Adjacent	209C1 (89.7)	WDYN, Chattanooga, TN BLED-796 035-10-17 / 085-18-58 62.00 kw / 250 m bearing from proposed = 204.66 deg	73.96 CLEAR (73 0.62 km)
		existing F(50,50) 60 =	63.58 km	
		proposed F(50,10) 80 =	9.76 km	
		existing F(50,10) 80 =	27.27 km	
		proposed F(50,50) 60 =	31.48 km	

END OF STUDY